

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON *et al.*, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

Case No. 2:20-cv-00424-JHC

STIPULATED MOTION AND ORDER  
REGARDING CLASS CERTIFICATION  
BRIEFING SCHEDULE AND  
RESCHEDULING THE HEARING ON  
PLAINTIFFS' PRIVILEGE MOTION

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

Case No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

No. 2:22-cv-00965-JHC

## STIPULATION

The parties, by and through their counsel, have agreed and stipulate as follows:

1. The parties agree that good cause justifies 1) a one-month interim extension of the Court's current class certification briefing schedule in the *De Coster* and *Frame-Wilson* cases and 2) deferring the Court's December 13, 2024 hearing on Plaintiffs' Motion to Compel Production of Documents from Amazon's Privilege Logs and for Appointment of a Special Master ("Privilege Motion") until January 14 or 15, 2025, if convenient for the Court.

2. Plaintiffs in both the *De Coster* and *Frame-Wilson* cases raised their concerns with Amazon regarding its recent production of circa 120 terabytes of new data relevant to Plaintiffs' motions. Amazon used these sets of data in connection with its Opposition to the *De Coster* Plaintiffs' Motion for Class Certification and the accompanying expert report. Plaintiffs assert that they need time to review, understand, and analyze these data before responding. As a professional courtesy, Amazon agrees to a 30-day interim extension to class certification deadlines in both *De Coster* and *Frame-Wilson* while the parties meet and confer to discuss a potentially longer extension.

3. The parties therefore propose a 30-day interim extension of the existing class certification schedules, as follows:

<i>Frame-Wilson</i>		
Briefs	Current Deadline [Dkt. 172]	Proposed Deadline
Class Certification Brief	December 20, 2024	<b>January 21, 2025</b>
Class Certification Opposition Brief	March 21, 2025	<b>April 21, 2025</b>
Reply Brief ISO Class Certification	May 23, 2025	<b>June 23, 2025</b>
<i>De Coster</i>		
Briefs	Current Deadline [Dkt. 160; 220]	Proposed Deadline
Reply Brief ISO Class Certification and Opposition to Amazon's Motion to Exclude & any Motion to Exclude Amazon's Expert	January 24, 2025	<b>February 24, 2025</b>
Amazon's Reply ISO Motion to Exclude & Opposition to Plaintiffs' Motion to Exclude	March 3, 2025	<b>April 2, 2025</b>
Plaintiffs' Reply ISO Motion to Exclude	March 31, 2025	<b>April 30, 2025</b>

4. Amazon's lead counsel, Karen Dunn, is unable to attend the Court's December 13, 2024 hearing on Plaintiffs' Privilege Motion but is available on January 14 or 15, 2025. As a professional courtesy, Plaintiffs agree to defer the hearing until either date, assuming it is convenient for the Court.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order, that:

5. The class certification deadlines contained in *Frame-Wilson*, Dkt. No. 172 and *De Coster*, Dkt. Nos. 160 and 220 are modified as follows.

6. In *Frame-Wilson*, Plaintiffs' deadline to file their class certification motion is **January 21, 2025**; Amazon's deadline to oppose Plaintiffs' class certification motion is **April 21, 2025**; Plaintiffs' deadline to file their reply in support of class certification is **June 23, 2025**.

7. In *De Coster*, Plaintiffs' deadline to file their reply in support of class certification, their opposition to Amazon's motion to exclude their expert, and any motion to exclude Amazon's expert is **February 24, 2025**; Amazon's opposition to any motion by Plaintiffs to exclude Amazon's expert is **April 2, 2025**; Plaintiffs' deadline to file a reply in support of any motion they file to exclude Amazon's expert is **April 30, 2025**.

8. The December 13, 2024 hearing on Plaintiffs' Privilege Motion is deferred and is rescheduled on \_\_\_\_\_.

IT IS SO STIPULATED.

DATED: December 10, 2024 HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: [steve@hbsslaw.com](mailto:steve@hbsslaw.com)

[barbaram@hbsslaw.com](mailto:barbaram@hbsslaw.com)

1 Anne F. Johnson (*pro hac vice*)  
2 594 Dean Street, Suite 24  
3 Brooklyn, NY 11238  
4 Telephone: (718) 916-3520  
E-mail: [annej@hbsslaw.com](mailto:annej@hbsslaw.com)

5 KELLER POSTMAN LLC

6 Zina G. Bash (*pro hac vice*)  
7 111 Congress Avenue, Suite 500  
8 Austin, TX 78701  
9 Telephone: (512) 690-0990  
E-mail: [zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

10 Jessica Beringer (*pro hac vice*)  
11 Shane Kelly (*pro hac vice*)  
12 Alex Dravillas (*pro hac vice*)  
13 150 North Riverside Plaza, Suite 4100  
14 Chicago, Illinois 60606  
Telephone: (312) 741-5220  
E-mail: [jessica.beringer@kellerpostman.com](mailto:jessica.beringer@kellerpostman.com)  
E-mail: [shane.kelly@kellerpostman.com](mailto:shane.kelly@kellerpostman.com)  
Email: [ajd@kellerpostman.com](mailto:ajd@kellerpostman.com)

15 Roseann Romano (*pro hac vice*)  
16 1101 Connecticut Avenue, N.W., Suite 1100  
17 Washington, DC 20036  
18 Telephone: (202) 983-5484  
E-mail: [roseann.romano@kellerpostman.com](mailto:roseann.romano@kellerpostman.com)

19 *Interim Co-Lead Counsel for Plaintiffs and the*  
20 *proposed Class*

21 QUINN EMANUEL URQUHART &  
22 SULLIVAN, LLP

23 By: /s/ Alicia Cobb  
24 Alicia Cobb, WSBA # 48685  
25 1109 First Avenue, Suite 210  
26 Seattle, WA 98101  
27 Telephone: (206) 905-7000  
28 Email: [aliciacobb@quinnemanuel.com](mailto:aliciacobb@quinnemanuel.com)

1 Steig D. Olson (*pro hac vice*)  
2 David D. LeRay (*pro hac vice*)  
3 Nic V. Siebert (*pro hac vice*)  
4 Maxwell P. Deabler-Meadows (*pro hac vice*)  
5 Elle Mahdavi (*pro hac vice*)  
6 51 Madison Avenue, 22nd Floor  
7 New York, NY 10010  
8 Telephone: (212) 849-7000  
9 Email: steigolson@quinnemanuel.com  
10 Email: davidleray@quinnemanuel.com  
11 Email: nicolassiebert@quinnemanuel.com  
12 Email: maxmeadows@quinnemanuel.com  
13 Email: ellemahdavi@quinnemanuel.com

14 Adam B. Wolfson (*pro hac vice*)  
15 865 South Figueroa Street, 10th Floor  
16 Los Angeles, CA 90017-2543  
17 Telephone: (213) 443-3000  
18 Email: adamwolfson@quinnemanuel.com

19 *Interim Executive Committee for Plaintiffs and the*  
20 *proposed Class*

21 DAVIS WRIGHT TREMAINE LLP

22 By: /s/ John A. Goldmark

23 John A. Goldmark, WSBA # 40980  
24 MaryAnn Almeida, WSBA #49086  
25 920 Fifth Avenue, Suite 3300  
26 Seattle, WA 98104-1610  
27 Telephone: (206) 622-3150  
28 Email: johngoldmark@dwt.com  
Email: maryannalmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

Karen L. Dunn (*pro hac vice*)  
William A. Isaacson (*pro hac vice*)  
Amy J. Mauser (*pro hac vice*)  
Martha L. Goodman (*pro hac vice*)  
Kyle Smith (*pro hac vice*)  
2001 K Street, NW  
Washington, D.C. 20006-1047  
Telephone: (202) 223-7300  
Email: kdunn@paulweiss.com  
Email: wisaacson@paulweiss.com  
Email: amauser@paulweiss.com  
Email: mgoodman@paulweiss.com  
Email: ksmith@paulweiss.com

*Attorneys for Defendant Amazon.com, Inc.*

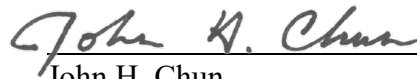
**ORDER**

Pursuant to the above stipulation, IT IS SO ORDERED. Furthermore:

In *De Coster*, the Court DIRECTS the Clerk to renote (1) Plaintiffs' Motion for Class Certification, Case No. 21-693, Dkt. # 180, for February 24, 2025; and (2) Amazon's Motion to Exclude, Case No. 21-693, Dkt. # 230, for April 2, 2025.

Finally, the Court STRIKES the December 13, 2024 hearing. The Court is unavailable on January 14 and 15, 2025. Therefore, on January 24, 2025, at 9:00 a.m., at a conference room at the United States Courthouse, counsel for the parties shall meet and confer to resolve Plaintiffs' pending motions to compel. Counsel shall contact the Courtroom Deputy via email, at ashleigh\_drecktrah@wawd.uscourts.gov, for the location of the conference room. If the parties are unable to resolve the Motions by 10:00 a.m. that day, then the Court will proceed with oral argument on the motions. Oral argument will take place in courtroom 14106. Counsel shall immediately notify the Court if the motions are resolved prior to the hearing scheduled above.

Dated: December 10, 2024.



John H. Chun

UNITED STATES DISTRICT JUDGE